

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin Y. Teruya (Bar No. 235916)
kevinteruya@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000

HAGENS BERMAN SOBOL SHAPIRO LLP

Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
(510) 725-3000

*Attorneys for Plaintiffs Maximilian Klein,
Rachel Banks Kupcho, and Sarah Grabert*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

This Document Relates To: All Consumer
Actions

Consolidated Case No. 3:20-cv-08570-JD

**CONSUMER PLAINTIFFS' INTERIM
ADMINISTRATIVE MOTION TO
PROVISIONALLY FILE UNDER SEAL
CONSUMER PLAINTIFFS' RENEWED
MOTION TO EXCLUDE PORTIONS OF
DR. DENNIS CARLTON'S PROPOSED
TESTIMONY AND SUPPORTING
MATERIALS**

The Hon. James Donato

1 Pursuant to the Court's March 25, 2024 Order granting the parties' stipulation to modify the
2 sealing procedures applicable to *Daubert* and other briefing, Dkt. 745, Consumer Plaintiffs submit
3 this interim administrative motion to provisionally file under seal the unredacted versions of
4 Consumer Plaintiffs' Renewed Motion to Exclude Portions of Dr. Dennis Carlton's Proposed
5 Testimony and certain exhibits submitted as attachments to the declaration of Kevin Y. Teruya in
6 support thereof. Consistent with the Court's March 25, 2024 Order, Consumer Plaintiffs will
7 coordinate with Facebook and non-parties to file an omnibus sealing motion. In the interim,
8 Consumers respectfully request that the Court provisionally maintain under seal the requested
9 materials.

1 DATED: April 28, 2025

2 By: /s/ Shana E. Scarlett

3 **HAGENS BERMAN SOBOL SHAPIRO LLP**

4 Shana E. Scarlett (Bar No. 217895)

5 shanas@hbsslaw.com

6 715 Hearst Avenue, Suite 202

7 Berkeley, CA 94710

8 (510) 725-3000

9 Steve W. Berman (admitted *pro hac vice*)

10 steve@hbsslaw.com

11 1301 Second Avenue, Suite 2000

12 Seattle, WA 98101

13 (206) 623-7292

14 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

15 W. Joseph Bruckner (admitted *pro hac*
16 *vice*)

17 wjbruckner@locklaw.com

18 Robert K. Shelquist (admitted *pro hac*
19 *vice*)

20 rkshelquist@locklaw.com

21 Brian D. Clark (admitted *pro hac vice*)

22 bdclark@locklaw.com

23 Kyle Pozan (admitted *pro hac vice*)

24 kjpozan@locklaw.com

25 Laura M. Matson (admitted *pro hac vice*)

26 lmmatson@locklaw.com

27 100 Washington Avenue South, Suite
28 2200

Minneapolis, MN 55401

(612) 339-6900

By: /s/ Kevin Y. Teruya

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin Y. Teruya (Bar No. 235916)

kevinteruya@quinnemanuel.com

Adam B. Wolfson (Bar No. 262125)

adamwolfson@quinnemanuel.com

Scott L. Watson (Bar No. 219147)

scottwatson@quinnemanuel.com

Claire D. Hausman (Bar No. 282091)

clairehausman@quinnemanuel.com

Brantley I. Pepperman (Bar No. 322057)

brantleypepperman@quinnemanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017-2543

(213) 443-3000

Michelle Schmit (admitted *pro hac vice*)

michelleschmit@quinnemanuel.com

191 N. Wacker Drive, Suite 2700

Chicago, IL 60606-1881

(312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)

manishasheth@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

(212) 849-7000

*Attorneys for Plaintiffs Maximilian Klein,
Rachel Banks Kupcho, and Sarah Grabert*

ATTESTATION OF KEVIN Y. TERUYA

This document is being filed through the Electronic Case Filing (ECF) system by attorney Kevin Y. Teruya. By his signature, Mr. Teruya attests that he has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: April 28, 2025

By /s/ Kevin Y. Teruya
Kevin Y. Teruya

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing it to be electronically served on all attorneys of record.

By /s/ Kevin Y. Teruya
Kevin Y. Teruya